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To: State Representative Frank Foster, Chair  
Michigan State House of Representatives Committee on Commerce  
Date: December 4, 2013  
Re: SB 169; Legislation Dealing with Autonomous Vehicles

Google appreciates Michigan's interest in autonomous vehicles (AV) and the goal of encouraging development of the AV technology. Unfortunately, SB 169 does not meet that goal and would instead make Michigan the most restrictive state of all the states that have passed bills on AVs.

Google has worked with others consistently since SB 169 was introduced earlier this year to help shape it into a bill that would provide for the operations of AVs in the state. We are disappointed that Michigan appears to be considering passage of a bill that will only allow for testing of AVs. This would make Michigan the single state, of all the states that have enacted AV legislation, to limit AVs to testing, or, put another way, the first state to prohibit operations, which would include the sale or lease of AVs. Other states have recognized the utility in enacting legislation clarifying the ability of AVs to operate in their states and have avoided the two-step process Michigan appears to be headed towards — first enacting a testing bill, followed at a later time by a bill making allowances for operations.

Google has offered amended language to SB 169 that brings it in line with the other laws enacted around the country and which seemed to be agreeable to all AV technology manufacturing parties in those states, yet agreement on language authorizing operations remains elusive. Nevertheless, we believe there are two options to address the issue of operations. First, the House could adopt amendment language Google proposed in the Senate authorizing operations and making several other clarifying changes to SB 169. Second, the House could adopt another proposal we have put forward which makes clear that companies developing AV technology can get M-plates from the Secretary of State for vehicles being tested or transported on the roads today.

In the case of the first proposal, the result that seems inevitable is reached more quickly. Should that not be feasible, the second proposal avoids the testing-only language, which would likely have to be unwound next year, or whenever an operations bill is taken up. Either of these solutions avoids having the home state of the auto industry fall behind other states in welcoming the advancement of automobile technology.

That AV technology is advancing quickly and will in the not-too-distant future be a commercialized product should not be in dispute. It would be a shame for Michigan to let some easily resolvable definitions and clarifications stand in the way of enacting operations legislation today. To do so would put Michigan in the awkward position of having to play catch up to the other states that have already embraced the future of where advancements in automobile technology are ultimately headed. We look forward to continuing to work with the House to find a way forward.